

Joint Status Report Pursuant to Rule 26(f)

Caption: **Maravilla Morales v. Trans Union, LLC, et al.** Civil Action No: **2:15-cv-6003-GJP**

Basis of Jurisdiction: **15 U.S.C. § 1681p and 28 U.S.C. § 1331**

Jury Trial: X Non-Jury Trial: _____ Arbitration: _____

Plaintiff's counsel participating in the Rule 26 Conference: **Gregory J. Gorski**

Defendants counsel participating in the Rule 26 Conference: **Angela M. Taylor**

Do counsel have full authority to settle at Rule 16 Conference? **Yes.**

If not, client with such authority who will attend conference:

When did the parties hold the Rule 26 Conference? **02/17/2016**

When did the parties comply with the Rule 26(a)'s duty of self-executing disclosure? **02/19/2016**

Does either side expect to file a case-dispositive motion? **Yes** (yes/no)

If yes, under what Rule: Experian anticipates filing a dispositive motion under FRCP 56.

If yes, specify the issue: Experian is entitled to judgment as a matter of law on Plaintiff's FCRA claims

Proposed deadline for filing dispositive motions: **30 days after close of discovery**

Does either side anticipate the use of experts? **No**

If yes, what is the proposed deadline for expert discovery?

Approximate date case should be trial-ready:

Time for Plaintiff's case: **1-2 Days** Time for Defendant's case: **1-2 days**

Is a settlement conference likely to be helpful? Yes If so, when:

Early No (yes/no) After Discovery Yes (yes/no)

What is the outcome of your discussions with your clients about proceeding before a Magistrate Judge for the final disposition?

Plan for Discovery:

1. The parties anticipate that discovery should be completed within 120 days.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? **60 days**
3. Have the parties discuss issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? **Yes**
4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which

should be included in a particularized discovery plan.

The parties anticipate submitting a protective order to treat as confidential documents relating to proprietary information.

5. If you contend the discovery period to exceed 90 days, please state reason:
The parties would like the opportunity to conduct settlement discussions after written discovery is completed, but before incurring the costs associated with conducting multiple party depositions.
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